

## Compliance Assessment Report CAR\_NRW0040997

**Permit being assessed:** NP3099FS.

For: Harp International Limited Gellihirion Hazardous Waste, held by Harp International Ltd  
At: Gellihirion Hazardous Waste, Reclamation and Storage Facility, GelliHirion Industrial Estate, Pontypridd, Rhondda Cynon Taff, CF37 5SX.

**Type of assessment carried out:** Report/Data Review, Reason: Routine.

On 31/12/2022.

Parts of permit assessed: Annual returns / Waste returns

**NRW Lead Officer:** Dale Padfield.

**Report sent to:** Caroline Harries, Quality & Environmental Manager on 27/01/2023.

### 1. Summary of our findings (full details in section 4)

| Part of permitted activity assessed (criteria)                                                                 | Assessment result | Permit condition |
|----------------------------------------------------------------------------------------------------------------|-------------------|------------------|
| E5 - Emissions - Waste                                                                                         | Assessed (A)      |                  |
| G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales | Assessed (A)      |                  |

Result types are explained in more detail in the 'Important Information' section below.

| Total number of non-compliances recorded | Total non-compliance score |
|------------------------------------------|----------------------------|
| 0                                        | 0                          |

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

### 2. What action is required?

No action required.

### 3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

**At this time, we do not intend to take any further action.**

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

### 4. Details of our assessment

Harp International Ltd

**Permit EPR/NP3099FS**

The Purpose of this compliance assessment report (CAR) is to review the quarterly waste returns for quarter four of 2022 along with the annual reporting returns.

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**Quarter four 2022 Waste Returns**

The Waste returns for quarter four (October – December) 2022 were received on the 16<sup>th</sup> of January 2023. A total of 5.88 tonnes of EWC code was received. All wastes are complaint, and the report is accepted.

**Annual Returns**

The annual returns were received on the 20<sup>th</sup> Of January 2023. Reports on the annual total for water usage, energy usage, generation of wastewater and generation of residues were received.

The tables in this report summarise data from 2021 and 2022 to provide various performance indicators using the total mass of the waste treated. It is appreciated that the reclaim process does not use water or generate wastewater and only contributes a small fraction to the total energy use of the site. However, when assessing energy and water efficiency, the entire installation should be considered. Harp are asked to continue this reporting method for subsequent annual reports, you may decide on an alternative means to express the performance indicator, such as using the total hours staff worked opposed to waste treated. Harp should decide which parameter would be the best fit and most appropriate to use to track trends.

**Waste & Residue Generation**

A total of 21.4 tonnes of waste was received by the site.

Residues generated by the process are oil removed during the reclamation of the waste refrigerants and a molecular sieve that over time becomes exhausted after drying the reclaimed gasses. Exhausted molecular sieve totalled 365kg and 864kg of oil was removed in 2022. No performance indicator was expressed for the residues, it's appreciated that Harp have no control over the levels of residues contained within the waste gasses and as such, a performance indicator is not required or be suitable for this parameter.

**Water Use**

No water is specifically used in the process, water is primarily used for domestic purposes. The table below shows water usage for 2021 and 2022.

| Year | Mains Water/<br>M3 | Total Waste treated /<br>tonnes | Water used per unit<br>waste treated / M3 per<br>Tonne of waste |
|------|--------------------|---------------------------------|-----------------------------------------------------------------|
| 2021 | 794                | 69.3                            | 11.5                                                            |
| 2022 | 673                | 21.4                            | 31.4                                                            |

The water used per unit of waste treated appears significantly increased from the previous year, however this is a result of the decreased waste treated in 2022. Overall water usage has decreased by 121 m<sup>3</sup> from the previous year.

### Energy Usage

The table below shows the energy usage for 2021 and 2022.

| Year        | Electricity<br>MWh | Natural<br>Gas<br>MWh | Total<br>Energy<br>Used<br>MWh | Total Waste<br>treated<br>tonnes | Energy Use per unit<br>waste treated ~<br>MWh per Tonne of<br>waste |
|-------------|--------------------|-----------------------|--------------------------------|----------------------------------|---------------------------------------------------------------------|
| <b>2021</b> | 1280               | 128.7                 | 1408.7                         | 69.3                             | 20.3                                                                |
| <b>2022</b> | 1150               | 142                   | 1292                           | 21.4                             | 60.4                                                                |

There appears to be an increase in energy usage per tonne of waste treated, however, as mentioned the actual reclaim process utilises only a small fraction of the total energy consumption for the installation. Overall energy consumption has decreased by 116.7MWh when compared to 2021.

On the 14/04/2022 Harp installed Sub meters on the reclaim plant to directly measure its energy consumption. For the period between the 14/04/2022 and 31/12/2022 the reclaim plant used 5.3 MWh. Trending the energy consumption of the reclaim plant using the total waste treated may provide a good indicator of its performance.

An alternative parameter, such as total staff hours worked, would likely provide a better performance indicator of the installation as a whole when trending overall energy and water usage.

All annual reports are accepted.

END.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

## Important information

### Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

### Assessment results and non-compliance categories (used in section 1):

| Assessment result | Description                                                       |
|-------------------|-------------------------------------------------------------------|
| Assessed (A)      | Assessed or assessed in part, no evidence of non-compliance found |
| Action only (X)   | Action only relating to the activity assessment                   |
| Ongoing (O)       | Ongoing non-compliance, not scored                                |

| Non-compliance category    | Description                                                                                                                 | Score |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------|-------|
| C1 Major                   | Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property | 60    |
| C2 Significant             | Potential to have a significant impact or effect on the environment, people and/or property                                 | 31    |
| C3 Minor                   | Potential to have a minor or minimal impact or effect on the environment, people and/or property                            | 4     |
| C4 No environmental impact | Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property       | 0.1   |

### How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

**What are suspended scores?**

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

**Full list of Industry and Waste action criteria (used in section 1 and 2):****A: Permitted activities**

- A1 Specified by permit

**B: Infrastructure**

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

**C: General management**

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

**D: Incident management**

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

**E: Emissions**

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

**F: Amenity**

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

**G: Monitoring and records, maintenance and reporting**

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

**H: Resources efficiency**

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

**Enforcement response**

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

**Data protection notice**

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

**Disclosure of information – this report will be available to view on-line**

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

**What do I do if I disagree with the report or have a complaint?**

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk) for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at [ask@ombudsman.wales](mailto:ask@ombudsman.wales)

**Welsh Language Standards**

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.